

**IN THE UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF OKLAHOMA**

DANIEL HANCHETT, as Personal  
Representative of the Estate of Shannon  
Hanchett, Deceased,

Plaintiff,

v.

SHERIFF OF CLEVELAND COUNTY  
IN HIS OFFICIAL CAPACITY;  
TURN KEY HEALTH CLINICS, LLC,  
DIANA MYLES-HENDERSON, LPC,  
TARA DOTO, LPN,  
NATASHA KARIUKI, LPN,

Defendants.

Case No. CV-24-87-J

**JOINT APPLICATION FOR PROTECTIVE ORDER**

**COME NOW** the parties and respectfully move this Court to enter the Agreed Protective Order, submitted to this Court via email and attached hereto as Exhibit 1. In support of this Application, the parties show this Court as follows:

1. The parties have conferred and agreed to begin discovery in the above-referenced case pursuant to LCvR 26.3(b).
2. As such, the parties are currently engaged in written discovery and document production.
3. Certain documents and information have been requested in this case which one or more of the parties may believe to be confidential.
4. In order to facilitate the free flow of information and protect against the disclosure of information deemed “confidential” to certain persons outside of this case, the parties have agreed to the proposed Agreed Protective Order.

5. A copy of the proposed Agreed Protective Order is attached hereto as Exhibit 1.

**WHEREFORE**, all premises considered, the parties respectfully request this Court's approval of the proposed Agreed Protective Order, which will be submitted for the Court's consideration via email.

Respectfully submitted,

s/ Jessica L. Dark

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Capacity***

s/ Bob Blakemore

*(signed with permission)*

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*Attorneys for Defendant Turn Key  
Health Clinics, LLC*

**CERTIFICATE OF SERVICE**

This is to certify that on the 10<sup>th</sup> day of June, 2024, I electronically transmitted the above document to the Clerk of Court using the ECF System for filing. Based on the records currently on file, the Clerk of Court will transmit a Notice of Electronic Filing to the attorneys of record in this matter.

s/ Jessica L. Dark  
Jessica L. Dark